

Meeting Minutes

Subjects: Facility Disposition RFCA Standard Operating Protocol and Component Removal, Size Reduction, and Decontamination RSOP

Date: June 13, 2000

Location: Broomfield City Hall

Attendees: Susan Wilds (RFCAB), Carol Lyons (Arvada), Steve Tarlton (CDPHE), Kathy Schnoor (Broomfield), Shirley Garcia (Broomfield), Mary Harlow (Westminster), PJ Timmerman (GAO), Amy Helwich (GAO), Pam Tumler (GAO), Lee Carroll (GAO), John Corsi (K-H), Fred Gerdeman (DOE), Jeff Stevens (K-H), Dyan Foss, Catherine Madore, and Pete Sanford

Objective of the Meeting: To discuss the public comments on the subject documents

Meeting was chaired by: Jeff Stevens

File: Administrative Record

The meeting was an informal roundtable in which everyone asked questions and expressed concerns.

The meeting was initiated by the GAO personnel indicating that they are doing an assessment of RFETS on how the money is being spent and decommissioning progress and controls.

The status of the Actinide Migration Report was given. All of the samples, except one, has been analyzed and indicate the presence of plutonium oxide, which is insoluble. The remaining sample is at LANL and currently not accessible. A new sample may be collected and sent for preparation. The remaining sample is on the acid spills and should provide the final data needed to complete the study.

Shirley Garcia asked how the 771/776 tunnel would be handled. It was her understanding the tunnel was contaminated and had leaked in the past. Jeff relayed the current characterization information that indicates that the tunnel does not contain much contamination, and the current plan to decontaminate the tunnel prior to decommissioning.

Mary Harlow asked a question pertaining to the ER transition. She is still not clear on whom, how, and when the work is going to be conducted once demolition activities are complete. Jeff discussed the 771 Project and how the ER activities will be integrated into the demolition process with the building shell being used as the containment during demolition. He also indicated that there is every intention to have the same contractor perform the demolition and ER activities so that there is no break between demolition and ER.



ADMIN RECORD

SW-A-004046

Steve Tarlton requested a status on the 707 and 371 Decommissioning Operations Plan (DOPs). Jeff indicated that the 707 DOP is in the final internal Kaiser-Hill review and then it will be going to DOE for their review. The 371 DOP is 3 to 4 weeks behind the 707 DOP schedule.

A discussion was held on the Protected Area (PA) closure. Mary Harlow requested a clarification on the requirements for PA closure. Jeff indicated that all of the requirements have been met for Building 771 and that Building 776 should have all of the requirements met by the end of the year. He went over the plan to reduce the PA to around Building 371.

Mary Harlow expressed concerns about performing decontamination, demolition, and final survey activities in the same building as indicated in the Facility Disposition RSOP. Jeff explained, using Building 779 as an example, that this is a complicated, but feasible process. He explained that controls that would be necessary to protect the environment and the worker.

Mary Harlow expressed that she is still not comfortable including Type 3 facilities with Type 2 facilities in the same decision document. Jeff reminded Mary that the Facility Disposition RSOP requires that the facility meet the free release criteria prior to implementing the RSOP. Therefore, the facility is essentially a Type 1 facility once it's demolished, although it will not be retyped.

Shirley Garcia asked where and in what circumstance explosives would be used on-site. Jeff used the Building 771 stack as an example of using explosives for safety reasons. He also discussed using explosives on the major concrete structures on-site. He gave another example of the use of explosives on a reactor in Kansas that was conducted for safety and engineering reasons.

Pam Tumler asked for a brief description of the scope of the Facility Disposition RSOP. Jeff indicated that the RSOP documents the facility disposition decision for all buildings on RFETS, provides demolition methodology, and NEPA coverage for transportation. There was a brief discussion on the document preparation process at RFETS, particularly on the consultation of the regulators and public. Both Steve Tarlton and Mary Harlow indicated that the process that is being used is beneficial for all parties, although more time consuming.

Mary Harlow expressed concerns about the dust resulting from explosives. She felt like the most appropriate criteria were no dust and a tent covering the facility. Jeff reiterated that the facility was going to meet free release criteria; therefore, the State's dust management requirements would apply, which does allow some dust.

Shirley Garcia asked if a certified opacity person was going to be on-site at all times. Jeff indicated that there would be someone on-site.

Shirley Garcia asked how the stacker receiver in Building 371 would be decontaminated. Jeff indicated that the planning was still preliminary, but the Project is looking into CO₂ pellet blasting, shot blasting, and decontamination solutions.

Shirley Garcia asked how the RCRA units were going to be handled in Building 771. Jeff indicated that the units would be handled in accordance with Closure Description Documents and closed through removal.

Mary Harlow indicated that she thought the document contained too many subjective statements. For example instead of using shall or will statements, the document contains may and in general statements. She agreed that she would flag the statements is bold that she thought were inappropriate.

PJ Timmerman asked if the soils would have to meet the free release criteria established for the concrete. Jeff indicated that soils are handled differently and that the criteria for release are based on concentration requirements. She also asked whether the concrete proposed for use as backfill met the free release criteria and how that compared to the criteria used for the soil. Jeff indicated that the concrete criteria is lower than the soil criteria.

A follow-on discussion was held on the free-release criteria. Mary Harlow made it clear that free-release does not meet clean and that although these are standards were established by the Nuclear Regulatory Agency, they may not be appropriate for RFETS. Jeff and Tarlton supported the use of the free-release criteria, and the fact that it is used all over the country.

Shirley Garcia asked how the shell of the building would be used as a shell for ER activities in Building 771. Jeff provided a brief sequencing of events with ER conducting characterization in early FY01 and plans being prepared so that that demolition and ER can occur in FY03. Tarlton indicated that sampling and analysis plans are being draft in consultation with the agencies on these sampling events.

Mary Harlow asked how the floors with epoxy and steel plates would handled. Jeff indicated that in most instances, the floors would be cut up and packed as low level waste. He indicated that in some circumstances, samples may be taken to determine the depth of contamination, but if the contamination extends beyond ½" into the concrete; it would be packaged as low level waste.

Mary Harlow asked if rail transportation was real option. Jeff indicated that the Site is serious considering it and is making plans to implement rail transportation. Tarlton indicated that rail transportation issue is not totally an RFETS issue, in that national implementation and policy needs to be addressed.

PJ Timmerman asked if there are volumetric contamination concerns. Jeff indicated that yes there was, with the floors, and the material will be cut up and packaged as low level waste because the Site currently does not have any criteria to release it.

Shirley Garcia asked how a deviation to the RSOP would be addressed, as is required to be documented in the notification letter to use the Facility Disposition RSOP. Jeff indicated that if the deviation addresses something (for example a demolition method) that would be used on several projects, then the RSOP will be modified. If it is something that is building specific, a separate decision document will be prepared.

Shirley Garcia was concerned that the Attachment to the Facility Disposition RSOP was the final determination on facility typing. Jeff explained to her that the facility typing is conducted after the reconnaissance level characterization and concurred to at the scoping meeting.

Shirley Garcia suggested adding some text to the Facility Disposition RSOP on the reconnaissance level characterization process.

Kathy Schnoor suggested that an addition be made to the flowchart for the LRA concurrence of the reconnaissance level characterization report.

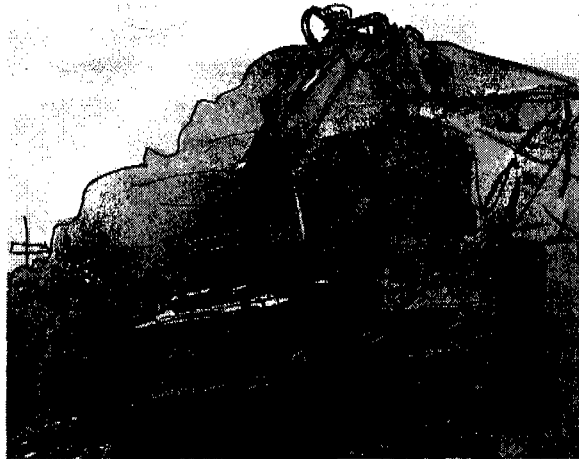
Mary Harlow asked how groundwater impacts would be addressed. Jeff discussed the new text in the Facility Disposition RSOP. The redlined text was distributed at the meeting. Jeff discussed the Site Groundwater Balance Study and how that will be used to address groundwater impacts, and that this activity was an ER function.

Shirley Garcia suggested adding a glossary to the document.

The meeting concluded. The Component Removal RSOP was not discussed and it was agreed that an additional meeting would be held the following week to address any questions or concerns.

D&D Pizza Meeting

Jeff Stevens
Kaiser-Hill Company
June 13, 2000



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CH040074.1

Agenda items

- RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities
- RSOP for Facility Disposition
- Other Issues / General Discussion

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CH040074.2

Meeting Purpose

- To address any questions or comments (on either RSOP or any other questions or concerns)
- Need to submit comments in writing to be addressed in the responsiveness summary



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Component RSOP Purpose

- To standardize methods by which size reduction, removal, and decontamination activities are conducted and controlled
- To identify general ES&H hazards and related mitigative measures
- To reduce cost of preparing numerous RFCA decision documents
- To expedite project activities



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Component RSOP Scope

- Physical removal of facility components (e.g. gloveboxes, tanks and ancillary piping, fume hoods, ventilation and filtration systems and other utilities)
- Size reduction of components to meet property reuse, waste management and/or transportation requirements
- Decontamination in preparation for removal, size reduction, and/or building demolition



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CH060074.p 5

Implementation

- For Type 2 and 3 facilities; Type 3 facility requires a Decommissioning Operations Plan that may reference the RSOP
- Implemented after reconnaissance level characterization, and notification letter is approved by DOE



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Schedule

- Being reviewed by regulators
- Scheduled for formal public comment on August 11, 2000
- Approval scheduled for November 6, 2000

CH2M HILL



RSOP for Facility Disposition Status

- Currently in public comment period
 - public comment period ends June 30
 - scheduled for approval on August 18
- Addressing regulator comments

CH2M HILL



Comments

- A redlined version of this section is available
- Changes will be documented in the responsiveness summary

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